

# **EXHIBIT 4**

Declaration of  
Jay M. Wolman

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Attorneys for Defendant  
Andrew Anglin

UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
MISSOULA DIVISION

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TANYA GERSH, ) Case No. 9:17-cv-50-DLC-JCL  
Plaintiff, )  
vs. ) **DECLARATION OF  
ANDREW ANGLIN IN SUPPORT  
OF DEFENDANT ANDREW  
ANGLIN'S MOTION FOR A  
PROTECTIVE ORDER**  
ANDREW ANGLIN, )  
Defendant. )  
\_\_\_\_\_  
RANDAZZA | LEGAL GROUP

**DECLARATION OF JAY M. WOLMAN**  
**IN SUPPORT OF DEFENDANT ANDREW ANGLIN'S**  
**MOTION FOR A PROTECTIVE ORDER**

I, Jay M. Wolman, declare:

1. I am over the age of 18 years and am fully competent to make this Declaration.
2. The facts set forth in this Declaration are within my personal knowledge and are true and correct to the best of my knowledge and belief.
3. I am one of the attorneys of record for Defendant Andrew Anglin.
4. I make this declaration in support of Defendant Andrew Anglin's Motion for a Protective Order, filed herewith.
5. My office received service of Plaintiff's First Set of Interrogatories to Defendant Andrew Anglin ("First Ints") and Plaintiff's First Requests for Production of Documents to Defendant Andrew Anglin ("First RPDs") via email on June 7, 2018.
6. A true and correct copy of Plaintiff's First Ints is attached to Defendant's Motion for a Protective Order as **Exhibit 1**.
7. A true and correct copy of Plaintiff's First RPDs is attached to Defendant's Motion for a Protective Order as **Exhibit 2**.
8. On July 5, 2018, I contacted counsel for Plaintiff and requested a 60-day extension of time in which to respond to the requests, noting that Mr. Anglin lives overseas and it would likely not be possible to gather all responsive documents and information in time.

9. A true and correct copy of my July 5, 2018 email to Plaintiff's counsel is attached to Defendant's Motion for a Protective Order as Exhibit 3.

10. Plaintiff's counsel declined my request for a 60-day extension, offering only a 14-day extension of time.

11. Thereafter, I spoke with Plaintiff's counsel telephonically on July 6, 2018 and discussed the necessity of seeking a protective order with the Court.

12. Due to the volume and scope of Plaintiff's discovery requests, locating all responsive documents will be an extremely time-consuming process for Mr. Anglin, and it will additionally take significant time for his counsel to confer with him on which documents need to be disclosed.

13. Mr. Anglin and his counsel will also need to have in-depth discussions about how to fully respond to Plaintiff's Ints.

14. Due to these circumstances, it will not be possible to respond fully to Plaintiff's discovery requests by even July 23, 2018.

15. On July 9, 2018, counsel for Defendant served timely objections to the First Ints and objections and initial responses to the First RPDs.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on July 9, 2018.

/s/ Jay M. Wolman  
Jay M. Wolman